

1 HANSON BRIDGETT LLP
 KURT A. FRANKLIN, SBN 172715
 2 kfranklin@hansonbridgett.com
 LISA M. POOLEY, SBN 168737
 3 lpooley@hansonbridgett.com
 SAMANTHA WOLFF, SBN 240280
 4 swolff@hansonbridgett.com
 425 Market Street, 26th Floor
 5 San Francisco, California 94105
 Telephone: (415) 777-3200
 6 Facsimile: (415) 541-9366

7 HANSON BRIDGETT LLP
 TYSON M. SHOWER, SBN 190375
 8 tshower@hansonbridgett.com
 LANDON D. BAILEY, SBN 240236
 9 lbailey@hansonbridgett.com
 500 Capitol Mall, Suite 1500
 10 Sacramento, California 95814
 Telephone: (916) 442-3333
 11 Facsimile: (916) 442-2348

12 OTTEN LAW, PC
 VICTOR OTTEN, SBN 165800
 13 vic@ottenlawpc.com
 KAVITA TEKCHANDANI, SBN 234873
 14 kavita@ottenlawpc.com
 3620 Pacific Coast Highway, #100
 15 Torrance, California 90505
 Telephone: (310) 378-8533
 16 Facsimile: (310) 347-4225

17 Attorneys for Plaintiffs
 CORY SPENCER, DIANA MILENA
 18 REED, and COASTAL PROTECTION
 RANGERS, INC.
 19

20 **UNITED STATES DISTRICT COURT**
 21 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
 22

23 CORY SPENCER, an individual;
 24 DIANA MILENA REED, an
 individual; and COASTAL
 25 PROTECTION RANGERS, INC., a
 26 California non-profit public benefit
 corporation,

27 Plaintiffs,
 28

CASE NO. 2:16-cv-02129-SJO (RAOx)

**PLAINTIFFS' NOTICE OF ERRATA
 AND ERRATA TO DECLARATION
 OF KURT A. FRANKLIN IN
 SUPPORT OF PLAINTIFFS'
 OPPOSITION TO DEFENDANTS
 CITY OF PALOS VERDES ESTATES
 AND CHIEF KEPLEY'S MOTION
 FOR SUMMARY JUDGMENT OR, IN
 THE ALTERNATIVE, SUMMARY**

ADJUDICATION

Judge: Hon. S. James Otero
 Date: September 5, 2017
 Time: 10:00 a.m.
 Crtrm.: 10C

Complaint Filed: March 29, 2016
 Trial Date: November 7, 2017

v.
 LUNADA BAY BOYS; THE
 INDIVIDUAL MEMBERS OF THE
 LUNADA BAY BOYS, including but
 not limited to SANG LEE, BRANT
 BLAKEMAN, ALAN JOHNSTON
 AKA JALIAN JOHNSTON,
 MICHAEL RAE PAPAYANS,
 ANGELO FERRARA, FRANK
 FERRARA, CHARLIE FERRARA,
 and N. F.; CITY OF PALOS VERDES
 ESTATES; CHIEF OF POLICE JEFF
 KEPLEY, in his representative
 capacity; and DOES 1-10,

 Defendants.

PLEASE TAKE NOTICE THAT Plaintiffs Cory Spencer, Diana Milena Reed, and the Coastal Protection Rangers, Inc. (Plaintiffs) file this Notice of Errata and Errata to correct the following errors contained in the Declaration of Kurt A. Franklin in Support of Plaintiffs' Opposition to the Defendants City of Palos Verdes Estates and Chief of Police Jeff Kepley's Motion for Summary Judgment or, in the Alternative, Summary Adjudication ("Franklin Declaration"), filed on July 31, 2017 at Docket No. 305:

1. Plaintiffs inadvertently attached an incorrect version of Exhibit 16, which is a transcript of the DVD of Swell Life of Chief Timm Browne and Peter McCollum. *See also* Franklin Decl., ¶ 17. Paragraph 17 has also been edited to note that the transcript is of selected excerpts from the DVD of Swell Life.

2. Plaintiffs inadvertently omitted an exhibit from the Franklin Declaration. The omitted exhibit contains a video of two reporters from The Guardian interacting with surfers at Lunada Bay, including Bay Boy Defendant Sang Lee, and Palos Verdes Estates Police Department Service Officer Catherine

Placek. This video was previously produced in discovery by Plaintiffs and labeled
bates PLTF002054 and is attached to the Franklin Declaration as Exhibit 37.

3. Plaintiffs mistakenly identified Exhibit 35 to the Franklin Declaration
as Bates No. PLTF002251. The correct Bates No. is PLTF002055. Paragraph 27 of
the Franklin Declaration has been revised to reflect the correct Bates number.

4. Paragraph 18 incorrectly states that Exhibit 34 consists of "select video
excerpts from the documentary The Swell Life (2001), Darren McInerney, Director,
which documents surfing localism." Language referencing "select video excerpts"
has been deleted to properly reflect that Exhibit 34 has been produced in its entirety.

Plaintiffs submit a revised version of the Franklin Declaration herewith,
which now: (1) includes a corrected Exhibit 16; (2) references The Guardian video
at Paragraph 45 and attaches the video at Exhibit 37; (3) references the correct Bates
No. for Exhibit 35; and (4) correctly reflects the substance of Exhibit 34. No other
changes have been made to the Franklin Declaration, though Plaintiffs resubmit all
exhibits to the Franklin Declaration to ensure completeness and clarity.

DATED: August 1, 2017

HANSON BRIDGETT LLP

By: /s/ Kurt A. Franklin

KURT A. FRANKLIN

LISA M. POOLEY

SAMANTHA D. WOLFF

TYSON M. SHOWER

LANDON D. BAILEY

Attorneys for Plaintiffs

CORY SPENCER, DIANA MILENA
REED, and COASTAL PROTECTION
RANGERS, INC.